

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
UNITED STATES OF AMERICA,

v.

BENJAMIN WEY and
SEREF DOĞAN ERBEK,

Defendants.

Crim. Action No.: 15-CR-00611 (AJN)

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the annexed Declaration of David Siegal, dated April 29, 2016 and the exhibits thereto, and the accompanying Memorandum of Law dated April 29, 2016, defendant Benjamin Wey will move this Court, before Judge Alison J. Nathan, United States District Judge, on a date to be determined by the Court, for an Order requiring the Government to (i) provide bill of particulars, (ii) promptly disclose and identify *Brady* and *Giglio* material, (iii) promptly identify the documents upon which it will rely at trial, and (iv) disclose Jencks Act, 18 U.S.C. § 3500 (“3500”) material and its witness list by no later than December 6, 2016, and for such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that pursuant to the parties’ agreement, any opposing affidavits and answering memoranda of law must be served by May 27, 2016 and any

replies to the opposing affidavits and answering memoranda of law must be served by June 24, 2016.

Dated: April 29, 2016

HAYNES AND BOONE, LLP
Counsel to Defendant Benjamin Wey

By: s/David Siegal
David Siegal
Joseph Lawlor
30 Rockefeller Plaza, 26th Floor
New York, New York 10112
(212) 659-4995
david.siegel@haynesboone.com